IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

RANDEL EDWARD PAGE, JR.,)
Plaintiff,))
v.) Case No. 3:23-cv-00851
UNITED STATES OF AMERICA, et. al.,	<i>)</i>)
Defendants.) Judge Williams Campbell, Jr.) Magistrate Judge Alistair Newbern

THE WEST CLINIC, PLLC'S RESPONSE IN OPPOSITION TO PLAINTIFF'S REQUEST FOR ENTRY OF DEFAULT

COMES NOW The West Clinic, PLLC, ("West"), and files this Response in Opposition to Plaintiff Randal Page's Request for Entry of Default. (D.E. 58). Plaintiff's request for entry of default against West, or any other defendant in this action, has no basis in law or fact. This Court has disposed of this action. Epic Systems Corporation and Baptist Memorial Health Care Corporation's oppositions to Plaintiff's Request for Default (D.E. 61 & 62) accurately set forth the standard the Court should apply to this request, and why it must be denied. For the forgoing reasons, West respectfully requests this court deny Plaintiff's request for entry of default.

Respectfully submitted,

s/J.D. Thomas

John-David H. Thomas (TN BPR No. 027582)
Mackenzie Hobbs (TN BPR No. 040271)
Barnes & Thornburg LLP
1600 West End Avenue, Suite 800
Nashville, TN 37203
jd.thomas@btlaw.com
mackenzie.hobbs@btlaw.com

Attorneys for The West Clinic, PLLC

CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2024, a true and exact copy of the foregoing document was served on all counsel of record via the Court's electronic filing system to the following:

Heather Cairns Ross

Tennessee Attorney General's Office

P O Box 20207

Nashville, TN 37202-0207

Email: heather.ross@ag.tn.gov

Chad M. Jackson

Morgan & Akins, PLLC

10 Burton Hills Blvd.

Suite 210

P O Box 158657

Nashville, TN 37215

Email: cjackson@morganakins.com

Brigid M. Carpenter

Baker, Donelson, Bearman, Caldwell & Baker Donelson (Memphis)

Berkowitz, PC (Nash) 1600 West End Avenue

Suite 2000

Nashville, TN 37203

Email: bcarpenter@bakerdonelson.com

Joel E. Tragesser

Quarles & Brady (IN Office) 135 N Pennsylvania Street

Suite 2400

Indianapolis, IN 46204

Email: joel.tragesser@quarles.com

Emily H. Huseth

Harris / Shelton

6060 Primacy Parkway

Suite 100

Memphis, TN 38119

Email: ehuseth@harrisshelton.com

Buckner P. Wellford

165 Madison Avenue

Suite 2000

Memphis, TN 38103

Email: bwellford@bakerdonelson.com

I also hereby certify that a true and exact copy of the foregoing documents was served via U.S. mail on the following individual:

Randel Edward Page, Jr. 13535 Cathy Road Byhalia, MS 38611

> s/John-David H. Thomas John-David H. Thomas